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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee, on Behalf of the*  
12 *Registered Holders of GSAMP Trust 2005-AHL, Mortgage Pass-Through Certificates, Series*  
13 *2005-AHL*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST  
17 COMPANY, AS TRUSTEE, ON BEHALF  
18 OF THE REGISTERED HOLDERS OF  
19 GSAMP TRUST 2005-AHL, MORTGAGE  
20 PASS-THROUGH CERTIFICATES, SERIES  
21 2005-AHL,

22 Plaintiff,

23 vs.

24 WESTCOR LAND TITLE INSURANCE  
25 COMPANY,

26 Defendant.

Case No.: 2:20-cv-00770-KJD-NJK

**STIPULATION TO 1) LIFT STAY, 2)  
AMEND COMPLAINT AND 3) SET  
RESPONSE DEADLINE**

27 Plaintiff, Deutsche Bank National Trust Company, as Trustee, on Behalf of the Registered  
28 Holders of GSAMP Trust 2005-AHL, Mortgage Pass-Through Certificates, Series 2005-AHL  
("Deutsche Bank"), and Defendant Westcor Land Title Insurance Company ("Westcor")  
(collectively, the "Parties"), hereby submit the following Stipulation to lift the stay, amend the  
Complaint, and to set Westcor's response deadline pursuant to this Court's Order [ECF No. 9].  
The Parties, by and through their undersigned counsel, stipulate and agree as follows:

1. On April 29, 2020, Deutsche Bank filed its Complaint against Westcor [ECF No.  
1];

1           2.       Thereafter, on June 4, 2020, the Court granted the Parties' Stipulation to Stay the  
2 instant action pending the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*,  
3 Ninth Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-WGZ) ("*Wells*  
4 *Fargo II*") [ECF No. 6];

5           3.       On November 5, 2021, the Ninth Circuit issued its Memorandum Disposition in  
6 *Wells Fargo II*, vacating the district court's decision granting dismissal of Wells Fargo's claims  
7 and remanding for further proceedings. The mandate issued on November 29, 2021;

8           4.       On April 27, 2022, this Court issued its Order requiring the Parties to file a  
9 stipulation to lift the stay, including deadlines for Deutsche Bank to amend its Complaint [ECF  
10 No. 9];

11          5.       The Parties hereby agree that the stay shall be lifted;

12          6.       The Parties further agree that Deutsche Bank shall have thirty (30) days from the  
13 entry of the order on this Stipulation to file its amended pleading;

14          7.       The Parties further agree that Westcor shall have thirty (30) days from the filing of  
15 Deutsche Bank's amended pleading to file its response;

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